

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

OPT OUT SERVICES LLC,

Plaintiff,

v.

No. 1-20-CV-443 (TSE/TCB)

oproutprescreen.com, et al.,

Defendants.

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

Plaintiff OPT OUT SERVICES LLC, by counsel, hereby moves, pursuant to Fed. R. Civ. P. 55(b) and the Local Rules of this Court, for the entry of a default judgment against the defendant domain names oproutprescreen.com, optiutprescreen.com, optoutpredscreen.com, optoutpreescreen.com, optoutprrescreen.com, optpoutprescreen.com, and opyoutprescreen.com in accordance with the accompanying memorandum of points and authorities.

As set forth in more detail in the accompanying memorandum of points and authorities, the Defendant domain names are all .COM domain names maintained in this judicial district by the top-level domain name registry for .COM domain names, VeriSign, Inc. Plaintiff moves for an Order directing VeriSign, Inc. to transfer the Defendant domain names to Plaintiff's domain name registrar of choice, GoDaddy.com LLC, and directing GoDaddy.com LLC to take all necessary steps to have plaintiff OPT OUT SERVICES LLC listed as the registrant for the domain names.

Dated: July 24, 2020

By: /s/ Attison L. Barnes, III /s/
Attison L. Barnes, III (VA Bar No. 30458)
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*Counsel for Plaintiff
Opt Out Services LLC*

CERTIFICATE OF SERVICE

I, Attison L. Barnes, III, hereby certify that on July 24, 2020, I electronically filed the foregoing by using the CM/ECF system. I also sent copies to the registrant of the domain names at the postal and email addresses provided by the registrant to the registrar of the domain names or, if none is available, to the registrar of the domain names:

Registration Private/Domains by Proxy, LLC
DomainsByProxy.com
14455 N. Hayden Road
Scottsdale, Arizona 85260
oproutprescreen.com@domainsbyproxy.com
optoutprrescreen.com@domainsbyproxy.com
(for oproutprescreen.com and optoutprrescreen.com)

ABOVE.COM PTY LTD.
6-8 East Concourse
Beaumaris, VIC 3193
Australia
optiutprescreen.com@privacy.above.com
opyoutprescreen.com@privacy.above.com
(for optiutprescreen.com and opyoutprescreen.com)

DNSPod, Inc.
c/o Yantai Disp Technology Co., Ltd. Company Xinwang Digital
2-4 Floor, Building G, #1 Siwei Rd., Beichen District
Tianjin, China 300000
abuse@dnspod.com
(for optoutpredreen.com)

WhoIs Agent
c/o Name.com, Inc.
PO Box 1769
Denver, CO 80201
abuse@name.com
(for optoutpreescreen.com)

Domain Protection LLC
c/o Sea Wasp LLC d/b/a Fabulous
3500 N Causeway Blvd, Suite 160
Metairie, LA 70002
abuse@fabulous.com
optpoutprescreen.comregistrant@fabulouswhoiscompliance.com
(for optpoutprescreen.com)

/s/ Attison L. Barnes, III /s/

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